

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Terry Glen Tucker, Esquire
Attorney-at-Law
80 West Broad Street
Bridgeton, NJ 08302
(856) 453-7440

In Re:

Yahaira Morales

Case No.:

18-14796

Judge:

JNP

Chapter:

13

JEANNE A. NAUGHTON, CLERK
FILED
NOV 14 2019
U.S. BANKRUPTCY COURT
BY DEPUTY
Bridgeton, N.J.

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

CREDITOR'S MOTION or CERTIFICATION OF DEFAULT
 TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following (choose one):

1. Motion for Relief from the Automatic Stay filed by mid first bank, creditor,

A hearing has been scheduled for Nov. 26th, at 10 a.m.

OR

Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____ m.

Certification of Default filed by _____, creditor,

I am requesting a hearing be scheduled on this matter.

OR

Certification of Default filed by Standing Chapter 13 Trustee

I am requesting a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (choose one):

Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached hereto.

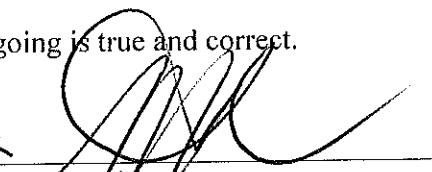
Payments have not been made for the following reasons and debtor proposes repayment as follows (explain your answer): Lost my job - Case P.A.A.C. helped me catch up by sending the mortgage a check in the amount of \$3370.00 I'm up to date

Other (explain your answer): _____

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 11/12/19


Debtor's Signature

Date: _____

Debtor's Signature

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within ten (10) days of the filing of a *Creditor's Certification of Default* (under an *Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*) or a *Trustee's Certification of Default*.

If this form is not filed the Motion or Certification of Default will be deemed uncontested and no hearing will be scheduled.

10/16/19

Attn: Bankruptcy Dept.

Fax: 405-767-5924

Yolanda Morales

856-982-0921

Loan # 0056934513

10711

pages including
Cover page

10711



Your fax has been sent successfully!

Date: Wed Oct 16 13:12:01 EDT 2019

Phone Number: 4057675924

Images Scanned: 11

Fax Id: 47158601-1f48-48ec-ac32-7a9fa6966aa3



Low prices. Every item. Every day
Store No: 0312
2124 North 2nd Street
Millville, NJ 08332
856-293-0914

262626 00 026 90160
Receipt #: 90160 10/16/2019 13:12

Qty	Description	Amount
11	Fax Long Distance - 2332921 (405-767-5924)	25.19
	SubTotal	25.19
	Taxes	0.83
	Total	USD \$26.02

VISA #:*****2081 [S]
Swipe
Auth No.: 452314

The Cardholder agrees to pay the Issuer of the charge card in accordance with the agreement between the Issuer and the Cardholder.

Compare and Save
With Staples-brand products.
THANK YOU FOR SHOPPING AT STAPLES!



03121016199016026

(from file) Nov. 26
B1 Nov 19
2nd Flr

Deals made for better workdays

SHIP 7 DAYS A WEEK — NIGHTS AND WEEKENDS.

20% off
signs, banners and posters
when you spend \$50 or more.

Valid through 11/9/19.

Coupon code: 79525

Valid online at staples.com/services/printing or in Staples® U.S. stores. Excludes Daily Deals, Auto Restock orders, banner accessories and outsource printing. While supplies last. Limit one coupon per customer, nontransferable. Offer is subject to change or cancellation at any time. Minimum purchase requirement must be met with purchases to which no other coupon or instant savings offer applies. Tax and shipping not included in calculating the minimum purchase. Each item purchased can only be discounted by one coupon, applied by cashier in the order received. Coupon not valid if purchased or sold and must be surrendered. No cash/credit back. Not valid on prior purchases or purchases made with Staples® Procurement or Convenience Cards. Coupon value applied pre-tax. Expires 11/9/19.



10% off
shipping.

Valid through 11/9/19.

Coupon code: 15596

Valid in Staples® U.S. stores only. Excludes postage stamps. While supplies last. Limit one coupon per customer, nontransferable. Offer is subject to change or cancellation at any time. Each item purchased can only be discounted by one coupon, applied by cashier in the order received. Coupon not valid if purchased or sold and must be surrendered. No cash/credit back. Not valid on prior purchases or purchases made with Staples® Procurement or Convenience Cards. Coupon value applied pre-tax. Expires 11/9/19.



Free shredding up to 2 lb.

Coupon code: 35987

Valid in Staples® U.S. stores only. While supplies last. Limit one coupon per customer, nontransferable. Offer is subject to change or cancellation at any time. Each item purchased can only be discounted by one coupon, applied by cashier in the order received. Coupon not valid if purchased or sold and must be surrendered. No cash/credit back. Not valid on prior purchases or purchases made with Staples® Procurement or Convenience Cards. Coupon value applied pre-tax. Expires 11/9/19.



KML LAW GROUP, P.C.

A PROFESSIONAL CORPORATION INCORPORATED IN PENNSYLVANIA

216 Haddon Avenue, Suite 406
Westmont, NJ 08108
(215) 627-1322
www.kmlawgroup.com

October 7, 2019

Yahaira Morales
801 8th North Street
Millville, NJ 08332

TERRY TUCKER
Terry Glen Tucker, P.C.
80 West Broad Street
Bridgeton, NJ 08302

RE: Yahaira Morales
Case No. 18-14796 JNP
Premises: 801 8th North Street Millville NJ 08332
Secured Creditor: MidFirst Bank

TO WHOM IT MAY CONCERN:

The Motion for Relief from Stay and supporting documents were served on you on **October 7, 2019**. Please be advised that the Motion for Relief from Stay is returnable before Judge Poslusny, **Jerrold N. Jr.** on **November 5, 2019 at 10:00 A.M.**

Please be guided accordingly.

Very truly yours,

KML LAW GROUP, P.C.
A Professional Corporation incorporated in Pennsylvania

Reschedule for 26th
/s/ Denise Carlon, Esq.
Brian C. Nicholas, Esquire
Denise Carlon, Esquire
KML Law Group, P.C.
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108
(215) 627-1322
DCarlon@KMLlawgroup.com
Attorney for Movant/Applicant

11/14/19 11/5/19



IN THE MATTER OF:

Yahaira Morales

DEBTOR(S),

**IN THE UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF NEW
JERSEY**

CHAPTER 13
CASE NO. 18-14796 JNP

**STATEMENT AS TO WHY NO BRIEF IS
NECESSARY IN ACCORDANCE WITH
"LOCAL RULES OF BANKRUPTCY
PRACTICE" RULE 3(C)**

The within Notice of Motion requests relief from the automatic stay on the grounds, as set forth on the accompanying Certification, that the debtor(s) have failed to maintain their monthly mortgage payments to the Secured Creditor.

As the facts the secured creditor relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

DATED: October 7, 2019

/s/ Denise Carlon, Esq.

Brian C. Nicholas, Esquire
Denise Carlon, Esquire
KML Law Group, P.C.
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108
(215) 627-1322
DCarlon@KMLlawgroup.com
Attorney for MidFirst Bank



40411

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Denise Carlon
KML LAW GROUP, P.C.
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108
MidFirst Bank

In Re:
Morales, Yahaira

Case No: 18-14796 JNP

Chapter: 13

Hearing Date: 11/5/19

Judge: Jerrold N. Poslusny Jr.

ORDER VACATING STAY

The relief set forth on the following page is hereby ordered **ORDERED**.

KML LAW GROUP, P.C.

A Professional Corporation incorporated in Pennsylvania
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108
(215) 627-1322
Attorneys for MidFirst Bank

4C

IN THE MATTER OF:

Yahaira Morales

DEBTOR(S),

IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY

CHAPTER 13
CASE NO. 18-14796 JNP

NOTICE OF MOTION FOR RELIEF
FROM STAY

TO:

Yahaira Morales
801 8th North Street
Millville, NJ 08332

TERRY TUCKER
Terry Glen Tucker, P.C.
80 West Broad Street
Bridgeton, NJ 08302

Isabel C. Balboa Esq.
Chapter 13 Standing Trustee
Cherry Tree Corporate Center - 535 Route 38 - Suite
580

Cherry Hill, NJ 08002

US TRUSTEE
Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **MidFirst Bank**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **401 Market Street, P.O. Box 2067; Camden, NJ**, for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be requested. The property involved is known as **801 8th North Street, Millville NJ 08332**. The hearing on this matter is scheduled for **November 5, 2019 at 10:00 A.M.**

Dated: October 7, 2019

/s/Denise Carlon, Esq.

Brian C. Nicholas, Esquire
Denise Carlon, Esquire
KML Law Group, P.C.
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108
(215) 627-1322
DCarlon@KMLlawgroup.com
Attorney for MidFirst Bank

20711

10/15/19
Yolanda Morales
801 North 8th St.
Millville NJ

①

RE: Order Vacating stay (documents)

To whom it may concern,

~~RE: I~~ I yolanda Morales D.O.B 8/27/83
last 4 digits of Social# 6041 purchased
my home back in 2016. 801 North 8th St.
Millville, NJ 08332. I was employed
by Millville Savings & Loans.

On March 10, 2019 I was let go
from my job. Which it put my
two children and I in a situation
we never been before. My children's
names are Jose L Acevedo JR
D.O.B 2/20/05 and Yolanda M Acevedo
D.O.B 11/20/08. And my two small
dogs. The struggles were real. I don't
receive Child support only \$50 a month.
Unemployment got denied twice and
Welfare didn't help. All the doors
were closing on me.

I had called the electric company,
gas, oil, car and mortgage company
to inform my situation. Unemployment
took for ever with the money. The
mortgage company aduse me along
as I made payments it was fine.
But when the payments stop B/C
I couldn't with everything myself.

7071

②

with the little bit I was receiving.

kids school clothes, shoes, food; car & bills all on me was too much. I been the month of September and the month of October behind on bill I have no income, my friends been buying me food for the house and helping in what they can. I been so hurt and destroyed since I lost my job. I been working since I was 11 years old and on my own.

no one had helped me. I build this Empire for my kids or my own to have it taken away.

I went to a local agency CASA PRO in Vineland and they said they will help my family. I got approved \$3,870 to be paid to my mortgage company. But it takes 30-45 business days.

Please allowed this days for you to receive this payment. After this payment I won't behind.

80911

③

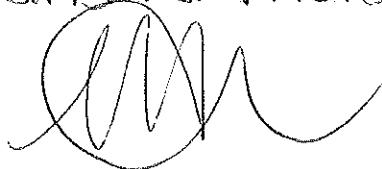
I finally got hired full time @ a Bank and as part time @ the dollar store.

I'm trying my best to build these family of mine once again. Please review my case and take this payment that is on their way and allow my kids and I to stay with our home.

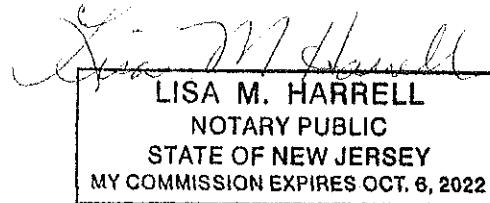
I be back on track moving forward I been blessed with a two jobs and I will be able to maintain my kids home again.

Please Review and allow us to stay in our home.

Sincerely
Yahaira Morales



Signed before me on
October 15, 2019



90711



Begin Your Career at Dollar Tree

October 11, 2019 at 9:45 AM

Dear Yahaira Morales:

It is our pleasure to inform you that you are a candidate for the position of PT CASHIER.

As you embark on a career with the leader in value retailing, you will need to complete certain documents.

J'

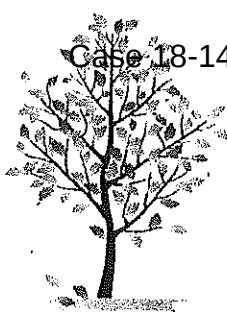
Click the Onboarding link below to access a secure and confidential website to complete necessary steps of the onboarding process.

You may need the following to complete this step of the process:

- Social Security Number
- Bank account information (if you want to sign-up for direct deposit)

We are required by legislation to verify that all newly hired individuals be authorized to





BRIDGETON ONIZED FEDERAL CREDIT UNION

339 Main Street • Cedarville, NJ 08311 (856) 692-4000 • Toll Free 888-896-4007

Yahaira Morales
801 North 8th St
Millville NJ 08332

September 26, 2019

Re: Offer of Employment

Dear Yahaira,

Please accept this letter as our offer of employment with Bridgeton Onized Federal Credit Union.

Start Date: 10/21/2019

Starting Salary: \$16.00 per hr

Position: Owner Service Representative Level 1

Expected Hours Per Week: 38+

Paid Time Off: As Per Policy

Trial Period: 90 Days

In addition, the credit union offers medical, dental and vision coverage for the employee which is partially paid by the credit union. Coverage for children or family is available at the employee's expense. There is a "buy-up" package that is available and the employee is responsible for the additional cost of this coverage. The waiting period for insurance coverage is 90 days.

Work hours initially are 8:20 through closing which is usually about 5:20 Monday through Thursday. On Tuesday, the day begins at 8:00 am with the Weekly Connection, a mandatory enterprise-wide meeting which lasts until approximately 9:10 am. Friday hours are extended to the ownership until 7:00 pm. Saturday hours begin at 8:20 and end at approximately 12:20 pm. Hours are subject to change at the discretion of management or as market demands.

Looking forward to having you on board.

Sincerely,


Joanne Casper September 26, 2019
Operations Manager

Yahaira Morales September 26, 2019
Owner Service Representative

Trust Your Bank...For Generations

110211

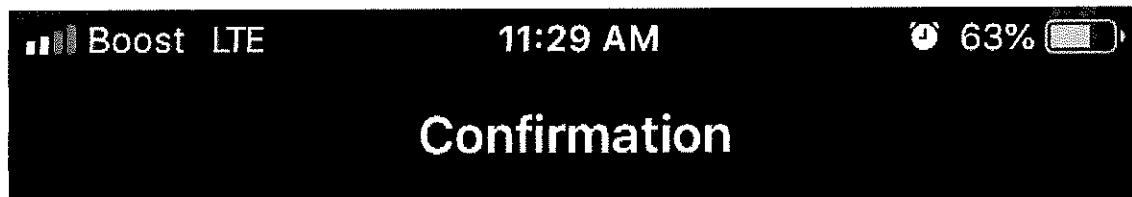
Fwd: Payment

From: Y Morales (yahairamorales2020@gmail.com)
To: mgoldsboro82@yahoo.com
Date: Tuesday, November 5, 2019, 08:18 AM EST

Sent from my iPhone

Begin forwarded message:

From: Y Morales <yahairamorales2020@gmail.com>
Date: November 5, 2019 at 8:13:09 AM EST
To: mgoldsboro82@yahoo.com
Subject: Payment



CONFIRMATION

To Midland Mortgage *4513

From Simply Checking ***4442

Amount \$823.00

Deliver by Oct 22, 2019

Confirmation #

DMMDV8_Q_ID5C

GOVTECH PAYMENT

FINVANTURE

Status

Scheduled

A payment may be canceled until it has been submitted to the biller.

Make Another Payment

View Scheduled Payments



1

Sent from my iPhone



HAROLD GONZALEZ BOARD PRESIDENT
JOSE A. MELENDEZ, EXECUTIVE DIRECTOR

September 23, 2019

Midland Mortgage
PO Box 26648
Oklahoma City, OK 73126-0648

Yahaira Morales
801 8th Street
Millville, NJ 08332

Re: Commitment Agreement

To Whom It May Concern:

This letter confirms the approval and commitment of the following consumers that apply for Mortgage assistance through SSH Program. Our payment will be mail out within 30-45 business days from date above.

<u>Consumer's Name</u>	<u>Loan Account:</u>	<u>Amount:</u>
Yahaira Morales	0056934513	\$ 3,370.00

Any questions or concerns, please feel free to contact our agency at (856) 692-2331 x108.

Sincerely,

Maria Maldonado
Coordinator of Rental/Utility Program
Casa P.R.A.C., Inc.
800 E. Chestnut Ave.
Vineland, NJ 08360